

SMILEY WANG-EKVALL, LLP

3200 Park Center Drive, Suite 250
Costa Mesa, California 92626
Tel 714 445-1000 • Fax 714 445-1002

SMILEY WANG-EKVALL, LLP
Lei Lei Wang Ekvall, State Bar No. 163047
lekvall@swelawfirm.com
Philip E. Strok, State Bar No. 169296
pstrok@swelawfirm.com
Timothy W. Evanston, State Bar No. 319342
tevanston@swelawfirm.com
3200 Park Center Drive, Suite 250
Costa Mesa, California 92626
Telephone: 714 445-1000
Facsimile: 714 445-1002

Proposed Attorneys for Elissa D. Miller,
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re
GIRARDI KEESE,

Alleged Debtor.

Case No. 2:20-bk-21022-BR
Chapter 7

**DECLARATION OF LEI LEI WANG
EKVALL IN SUPPORT OF
STIPULATION TO EXTEND DEADLINE
TO RESPOND TO NOTICE OF MOTION
AND MOTION FOR RELIEF FROM THE
AUTOMATIC STAY FILED BY FRANTZ
LAW GROUP, APLC**

DATE: January 26, 2021
TIME: 10:00 a.m.
CTRM: 1668

I, Lei Lei Wang Ekvall, declare:

1. I am a partner with Smiley Wang-Ekvall, LLP, proposed attorneys for Elissa D. Miller, Chapter 7 Trustee of the bankruptcy estate of Girardi Keese (the "Trustee"). I am licensed to practice before this Court and the courts of the State of California. I know each of the following facts to be true of my own personal knowledge, except as otherwise stated and, if called as a witness, I could and would competently testify with respect thereto. I make this declaration in support of the *Stipulation to Extend Deadline to Respond to Notice of Motion and Motion for Relief from Stay* (the

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1 "Stipulation") . Unless otherwise defined in this declaration, all terms defined in the
2 Stipulation are incorporated herein by this reference.

3 2. According to the Court's docket, on December 18, 2020, an involuntary
4 chapter 7 bankruptcy petition was filed against Girardi Keese ("Debtor"). As of the filing
5 of the involuntary petition, Debtor was counsel of record in a significant number of
6 matters which were undertaken on a contingency basis.

7 3. The petitioning creditors moved for the appointment of an interim trustee
8 which was granted by the Court by order entered January 5, 2021. The Trustee was
9 appointed as the interim chapter 7 trustee on January 6, 2021.

10 4. On December 30, 2020, Frantz filed a *Notice of Motion and Motion for*
11 *Relief From the Automatic Stay* [Docket No. 31] (the "Motion"). The Motion is scheduled
12 for hearing on January 26, 2021, at 10:00 a.m. The deadline to respond to the Motion is
13 January 12, 2021.

14 5. The Trustee was only recently appointed on January 6, 2021, and has not
15 had sufficient time to fully evaluate the Debtor's business or the relief sought by Frantz.
16 Accordingly, I requested and Frantz agreed to extend the deadline to respond to the
17 Motion for seven days to afford the Trustee additional time to properly evaluate the
18 Debtor's affairs and determine the best course of action going forward. The Stipulation
19 filed concurrently herewith reflects the parties' agreement.

20 I declare under penalty of perjury under the laws of the United States of America
21 that the foregoing is true and correct to the best of my knowledge.

22 Executed on this 11th day of January, 2021, at Costa Mesa, California.

24 /s/ Lei Lei Wang Ekvall
25 LEI LEI WANG EKVALL

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 3200 Park Center Drive, Suite 250, Costa Mesa, CA 92626.

A true and correct copy of the foregoing document entitled (*specify*): **DECLARATION OF LEI LEI WANG EKVALL IN SUPPORT OF STIPULATION TO EXTEND DEADLINE TO RESPOND TO NOTICE OF MOTION AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY FILED BY FRANTZ LAW GROUP, APLC** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) January 12, 2021 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On (*date*) January 12, 2021, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Honorable Barry Russell
U.S. Bankruptcy Court
Roybal Federal Building
255 E. Temple Street, Suite 1660
Los Angeles, CA 90012

☐ Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 12, 2021

Date

Gabriela Gomez-Cruz

Printed Name

/s/ Gabriela Gomez-Cruz

Signature

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")

- Richard D Buckley richard.buckley@arentfox.com
- Marie E Christiansen mchristiansen@vedderprice.com, ecfladocket@vedderprice.com,marie-christiansen-4166@ecf.pacerpro.com
- Jennifer Witherell Crastz jcrastz@hrhlaw.com
- Ashleigh A Danker Ashleigh.danker@dinsmore.com, SDCMLFiles@DINSMORE.COM;Katrice.ortiz@dinsmore.com
- Clifford S Davidson csdavidson@swlaw.com, jlanglois@swlaw.com;cliff-davidson-7586@ecf.pacerpro.com
- Lei Lei Wang Ekvall lekvall@swelawfirm.com, lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- Richard W Esterkin richard.esterkin@morganlewis.com
- Timothy W Evanston tevanston@swelawfirm.com, gcruz@swelawfirm.com;lgarrett@swelawfirm.com;jchung@swelawfirm.com
- Eric D Goldberg eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- Andrew Goodman agoodman@andygla.com, Goodman.AndrewR102467@notify.bestcase.com
- Steven T Gubner sgubner@bg.law, ecf@bg.law
- Marshall J Hogan mhogan@swlaw.com, knestuk@swlaw.com
- Razmig Izakelian razmigizakelian@quinnemanuel.com
- Lewis R Landau Lew@Landaunet.com
- Peter J Mastan peter.mastan@dinsmore.com, SDCMLFiles@dinsmore.com;Katrice.ortiz@dinsmore.com
- Edith R Matthai ematthai@romalaw.com
- Kenneth Miller kmiller@pmcos.com, efilings@pmcos.com
- Elissa Miller (TR) CA71@ecfcbis.com, MillerTrustee@Sulmeyerlaw.com;C124@ecfcbis.com;ccaldwell@sulmeyerlaw.com
- Eric A Mitnick MitnickLaw@aol.com, mitnicklaw@gmail.com
- Scott H Olson solson@vedderprice.com, scott-olson-2161@ecf.pacerpro.com,ecfsfdocket@vedderprice.com,nortega@vedderprice.com
- Michael J Quinn mquinn@vedderprice.com, ecfladocket@vedderprice.com,michael-quinn-2870@ecf.pacerpro.com
- Ronald N Richards ron@ronaldrichards.com, morani@ronaldrichards.com,justin@ronaldrichards.com
- Philip E Strok pstrok@swelawfirm.com, gcruz@swelawfirm.com;1garrett@swelawfirm.com;jchung@swelawfirm.com
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
- Eric D Winston ericwinston@quinnemanuel.com
- Christopher K.S. Wong christopher.wong@arentfox.com, yvonne.li@arentfox.com
- Timothy J Yoo tij@lnbyb.com